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UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON  
(HONORABLE SALVADOR MENDOZA, JR.)

UNITED STATES OF AMERICA,

Plaintiff,

vs.

BRANDON C. CAMPBELL,

Defendant.

No. 4:19-CR-06007-SMJ-3

SUPPLEMENT TO  
SENTENCING  
MEMORANDUM

Hearing: July 28, 2020 at  
11:00 a.m.  
WITH ORAL ARGUMENT

**CERTIFICATE OF SERVICE**

HEREBY CERTIFY that on July 22, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System and sent notification of such filing to the following:

Mr. David Herzog  
Assistant United States Attorney  
Eastern District of Washington  
United States Attorney's Office  
P.O. Box 1494  
Spokane, WA 99210-1494

By: /s/ KATHLEEN SCHROEDER  
Legal Assistant to Peter S. Schweda

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**Thomas H White**

2 Brentwood Ave  
Troy, NY. 12180  
(518) 270-9502

18th July, 2020

**Federal Court System**

To all concerned;

I've known Brandon Campbell his whole life. His father Chris often brought him to my house when Chris came to visit his brother Richard. He was always a friendly, bubbly child who was a pleasure to have around.

As long as I've known him he has continued to be friendly and pleasant. He always did his best to get others to like him. He seemed to just want to fit in. This was hard for him as he is mentally slower than many (officially diagnosed years ago) and so he did his best to try to keep up with others. Unfortunately this did make him easily manipulated by others his own age. Additionally he was much smaller than many of his peers. This made it easy for others to dominate him.

I have never personally seen him commit any act that would hurt others on purpose. This doesn't mean that he was an angel, but he was not malevolent. He has paid for the mistakes he's made in the past and will need to pay for his current involvement in this situation.

I do believe that this was a situation where he got in over his head. He moved to Washington for what he believed to be love. This put where he had left the area where he had a small support network and put him out on his own with no backup. When the situation deteriorated I believe his lack of support left him following bad people in an awful situation and that he wasn't capable of figuring how to easily get out. He eventually did return home but not before cooperating with those going down a bad track.

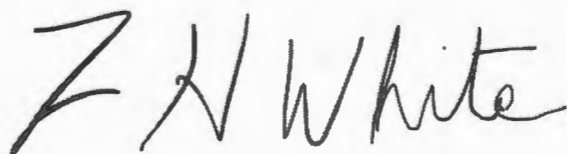
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I've been told that he immediately co-operated with the authorities when brought in for questioning. He truly believed that telling the truth of what happened would be the right thing to do. Initially, he didn't understand that cooperating with a bad guy when you didn't understand a way out still left you responsible for the acts committed. He has since come to understand his culpability and knows there must be punishment. I believe totally that he is sorry for his actions and hopes that the victims of the acts he helped occur are able to successfully move on with their lives.

I hope that you are able to sentence Brandon with compassion. He does need to pay for his bad actions but I believe the sentencing should also recognize his level of culpability. He was in a bad situation where, like the victims, he feared for his life and the lives of the others. He had no support network and little ability to think of a way out of the situation.

When Brandon is eventually released from his correctional sentence he hopes to return to his home area and move forward. We will be here waiting to help.

Sincerely,

A handwritten signature in black ink that reads "TH White". The "T" is large and stylized, with a long horizontal stroke. The "H" is also stylized, and "White" is written in a cursive script.

**Thomas H White**

To whom it may concern,

My name is Scott Richard and I am here today to write a letter on behalf of Mr. Brandon Campbell. I have known Brandon going on about 4 years now and I am deeply saddened by the current situation he is currently facing. I hope that this letter sheds some light on the kind of person that Brandon Campbell truly is.

I met Brandon through a mutual friend a little over 4 years ago and since that time I have seen Brandon grow in many ways. When I first met Brandon he had been a teenager with the kind of outlook on life that most teenagers have. In the past I had assisted Brandon in gaining employment which he was gainfully employed at until about a year prior to his arrest. Brandon is a hard worker and makes friends where ever he finds himself. In a way that can be a blessing but also at the same time it can be a curse. Since I have known Brandon I have noticed that he always seems to try to gain the approval or affection of the other people around him. Brandon always tried to impress the people around him even if those people were not the best people to try and impress. I do not know much about Brandons childhood but I suspect that the practice of trying to gain affection and approval of others is not something new to him.

Brandon had been enrolled in Bryant & Stratton college in Albany New York for his medical assistant degree and at the same time had been taking care of his daughter Hazel. Sadly about 2 years Brandon had lost full custody of his daughter because he missed a court date regarding the custody status because of a medical emergency within his family and the court refused to reschedule. Brandon had been working and trying to save up money for a lawyer in order to get partial custody back of his daughter. I have many friends who are fathers and Brandon by far out ranks them as far as being there for his daughter. Prior to his arrest he had been to every birthday, Christmas, and has given the mother of his daughter funds to be able to provide for his daughter. I am also aware that Brandon has spoken to both the mother of his child and Hazel multiple times while incarcerated in Sunnyside Jail.

I will admit that I do not know the full realm of his current circumstances. I know that Brandon is deeply saddened by the lives that he has changed due to his actions. I know that when I speak to him on the phone or receive his letters I can tell a change in him and his mentality. Brandon is a kind, loving, and caring young man with his whole life ahead of him. I have faith that he has learned from this situation and it has truly made him hit rock bottom. Sometimes in life we need to hit the bottom in order to not only realize what is important but also to make us

understand that we are human and that no matter what we can never give up. Once we hit the bottom the only thing left to do is go up. Our past does not define us, how we handle our past and how we move forward is what defines us.

I ask that you please grant some lenience to Brandon upon his sentencing date. I understand that we all must be held accountable for our wrong doings but I hope that you see the potential that Brandon has to offer. I also ask you to please request that Brandon be placed in a prison as close to his home as possible. Brandon's family is not financially able to travel long distances to see Brandon in a visit. Family, friends, and a support system are paramount to a felon/ex-felons success both in prison and once released.

Thank you for your time.

Sincerely,

A handwritten signature in black ink, appearing to read 'Scott Richard', with a long horizontal flourish extending to the right.

Scott Richard  
Firefighter/Paramedic Supervisor  
New York State Department Emergency Medical Services

To whom it may concern,

Hello, my name is Karen Campbell and I am writing this letter in support for my grandson Brandon Campbell. I know that Brandon is facing some serious charges and I hope that a letter in support of him will give me the chance to show a side of Brandon that most people do not know. Thank you for taking the time to read my letter.

Brandon has had some rough roads growing up, but he has overcome the past and has become a good father to his daughter Hazel, a caring brother to his sisters and brothers, and is an ever improving son to both of his parents. Brandon has never really been a leader in life but more of a follower and sadly it seems that has lead him to where he is today. I honestly know that Brandon is a good hearted and kind person. He has at sometimes fallen in with the wrong crowd but only did so to try and gain approval of others. Brandon has been a great father to his daughter Hazel and prior to his arrest for this current charge he was in the process of gaining full time employment and attempting to regain partial custody of Hazel. Even though he did not have custody, Brandon was always present for holidays, birthdays, and important events in his daughters life. Even while incarcerated he has made sure that his daughters needs have been met with the help of family and his friends.

In life we all make choices that can lead to either a positive or negative outcome. I know that we all must be held accountable for our actions and I do feel that Brandon should be held accountable for the hurt he has caused. The times I have written him and talked to him on the phone I can tell that this incident has truly rocked him to the core. Brandon truly realizes the hurt he has cause all involved. Brandon has had time to think and grow upon himself while he has been in jail awaiting his sentencing. He has began reading the bible and partaking in religious material that both I and his friends have sent him. Brandon can be so much more then he is and I hope that you see the same amount of potential that I see in him.

Brandon has a very caring support system at home including myself, his brother and sisters, along with his mother, father, and a few close friends. He has a stable home when he is released with his uncle and has a few places that are willing to hire him upon his release so that he can once again become a productive member of society.

Your honor I ask that you please grant Brandon some leniency when he is

sentenced. I know that when Brandon is sent to prison that he plans to obtain his GED as well as partake in a trade or college course. It is sad that it took a situation such as this for him to realize what and who are important in life.

Once again, thank you for your time and consideration in this matter.

Sincerely,  
Karen Campbell

*Karen Campbell*





Brandon is actually a decent kid that got messed up with the wrong person. I love him and ~~and~~ I will try to keep him out of trouble. He just needs some guidance on the right path.

Sincerely,

Richard C Lucas Jr

His uncle Richard C Lucas Jr